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United Automobile, Aerospace And Agricultural Workers Of America, AFL-CIO
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9 **UNITED STATES OF AMERICA**
10 **BEFORE THE NATIONAL LABOR RELATIONS BOARD**
11 **SAN FRANCISCO DIVISION OF JUDGES**

12 TESLA, INC.,
13 Respondent,
14 and
15 MICHAEL SANCHEZ, an Individual,
16 Charging Party,
17 and
18 JONATHAN GALESCU, an Individual,
19 Charging Party,
20 and
21 RICHARD ORTIZ, an Individual,
22 Charging Party,
23 and
24 INTERNATIONAL UNION, UNITED
25 AUTOMOBILE, AEROSPACE AND
26 AGRICULTURAL WORKERS OF
27 AMERICA, AFL-CIO,
28 Charging Party.

Case Nos. 32-CA-197020
32-CA-197058
32-CA-197091
32-CA-197197
32-CA-200530
32-CA-208614
32-CA-210879

**CHARGING PARTIES' OPPOSITION
TO RESPONDENT'S REQUEST FOR
SPECIAL PERMISSION TO APPEAL
ADMINISTRATIVE LAW JUDGE'S
ORDER DENYING RESPONDENT'S
MOTION TO DISMISS, REQUEST FOR
DE NOVO REVIEW, AND MOTION FOR
JUDGEMENT AS A MATTER OF LAW**

1 The Charging Parties in Case Nos. 32-CA-197020, *et al.*, oppose Respondent Tesla, Inc.'s
2 August 24, 2018 Request For Special Permission to Appeal Administrative Law Judge's
3 August 10, 2018 Order Denying Respondent's Motion to Dismiss, Request For De Novo Review,
4 and Motion For Judgment As A Matter Of Law for the reasons stated in the General Counsel's
5 August 30, 2018 Opposition.

6 Charging Parties respectfully request that the Board deny Respondent's Request for
7 Special Permission to Appeal from the Judge's Order Denying Respondent's Motion to Dismiss.
8 If, however, the Board permits the Appeal, Charging Parties respectfully request that the Board
9 affirm the Judge's August 10, 2018 Order and deny Respondent's Request for *De Novo* Review
10 and its Motion for Judgment as a Matter of Law.

11 DATED: September 4, 2018 SCHWARTZ, STEINSAPIR, DOHRMANN
12 & SOMMERS LLP
13 MARGO A. FEINBERG
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16 By Margo A. Feinberg
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18 Attorneys for Charging Parties Michael Sanchez,
19 Jonathan Galescu, Richard Ortiz, and International Union,
20 United Automobile, Aerospace and Agricultural Workers of
21 America, AFL-CIO
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I am employed in the County of Los Angeles, State of California; I am over the age of eighteen years and am not a party to this action; my business address is 6300 Wilshire Boulevard, Suite 2000, Los Angeles, California 90048-5268.

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Noah J. Garber
National Labor Relations Board, Region 32
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Oakland, CA 94612-5224

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Administrative Law Judge Amita Tracy
National Labor Relations Board
Division of Judges
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